

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769.	Rulemaking 14-08-013 (Filed August 14, 2014)
And Related Matters.	Application 15-07-002 Application 15-07-003 Application 15-07-006
<b>(NOT CONSOLIDATED)</b>	
In the Matter of the Application of PacifiCorp (U901E) Setting Forth its Distribution Resource Plan Pursuant to Public Utilities Code Section 769.	Application 15-07-005 (Filed July 1, 2015)
And Related Matters.	Application 15-07-007 Application 15-07-008

**CLEAN COALITION REPLY COMMENTS ON PROPOSED DECISION ON TRACK 2  
DEMONSTRATION PROJECTS**

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**CLEAN COALITION REPLY COMMENTS ON PROPOSED DECISION ON  
TRACK 2 DEMONSTRATION PROJECTS**

**I. INTRODUCTION**

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Clean Coalition respectfully submits these reply comments on Administrative Law Judge Peter Allen’s *Proposed Decision on Track 2 Demonstration Projects* (“PD”), dated January 10, 2017. The Clean Coalition generally supports the balanced approach of the PD and its approval of a number of demonstration projects. These reply comments respectfully urge the Commission to additionally consider the “Click and Claim” automated interconnection process for possible inclusion in the investor-owned utilities’ (“IOUs”) demonstration projects.

## **II. DESCRIPTION OF THE PARTY**

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of distributed energy resources (“DER”)—such as local renewables, advanced inverters, demand response, and energy storage—and we establish market mechanisms that realize the full potential of integrating these solutions. The Clean Coalition also collaborates with utilities and municipalities to create near-term deployment opportunities that prove the technical and financial viability of local renewables and other DER.

## **III. COMMENTS**

The Clean Coalition supports the PD’s approval of select Track 2 demonstration projects. The pilot projects will yield critical lessons regarding DER procurement and deployment. The Clean Coalition also supports a number of significant modifications the Commission included in approving the pilot projects, including the introduction of cost caps and the requirement to leverage existing DER. The demonstration projects will importantly advance cost-effective DER deployments that achieve net benefits.

In order to create even more innovative and cost-effective pilots, the Clean Coalition supports the Community Environmental Council’s comments regarding consideration of a proposed “Click and Claim” automated interconnection process.<sup>1</sup> We agree that the Commission erred in failing to address this proposal in the Proposed Decision (“PD”), and we support modifying the PD to direct each utility to incorporate automated review and processing of interconnection applications within one or more of their demonstration projects.

The IOUs have made significant strides in streamlining and automating interconnection application and internal review processes. Further, the continuing development of interconnection maps and pre-application reports has helped improve the success rate of applicants seeking Fast Track and Supplemental Review in recent years.

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<sup>1</sup> *Community Environmental Council Opening Comments on Proposed Decision on Track 2 Demonstration Projects at 5–7* (Jan. 13, 2017).

These efforts have reduced both the number of unsuccessful applications and the time spent reviewing and submitting applications—thereby significantly reducing interconnection costs for all parties. Further utilizing pre-established interconnection hosting capacity study data and automated screening, such as put forward in the Click and Claim proposal, would continue to streamline IOU interconnection processes and achieve additional cost reductions.

The *Assigned Commissioner’s Ruling on Guidance for Public Utilities Code Section 769—Distribution Resource Planning* specifically identifies “the need to dramatically streamline and simplify processes for interconnecting to the distribution grid to create a system where high penetrations of DER can be integrated seamlessly” as a goal of this proceeding.<sup>2</sup> The IOUs completed Demonstration Project A, addressing enhanced Integration Capacity Analysis (“ICA”), in December 2016, and the utilities’ reports indicate that the utilities could apply the methodology to study and prescreen the distribution system in support of streamlined interconnection processes. However, there is no plan to incorporate the ICA into the interconnection review process.

The ICA Working Group has identified use of the ICA results in the screening process for interconnection applications as a developmental goal and actively discussed the steps required for this use case; the timeline for such development and trial application is consistent with the proposed schedule for Demonstration Projects C, D, and E, as identified in the Proposed Decision.

The Click and Claim proposal advances the goals of the ACR in “utilizing the Integration Capacity Analysis to support planning and streamlining of Rule 21 for distributed generation . . . , with a particular focus on developing new or improved ‘Fast Track’ standards.”<sup>3</sup> This additional automated process sensibly builds upon the automated processes that have already been developed under Rule 21. The Clean Coalition therefore respectfully urges the Commission to address the Click and Claim

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<sup>2</sup> R.14-08-013, *Assigned Commissioner’s Ruling on Guidance for Public Utilities Code Section 769—Distribution Resource Planning*, Attachment A: Guidance for Section 769—Distribution Resource Planning at 3 (Feb. 6, 2015).

<sup>3</sup> *Id.* at 3–4.

proposal and direct the IOUs to incorporate the automated processes into their demonstration projects as they proceed.

As the Community Environmental Council notes, the Commission requested and received this proposal in timely filings as an additional potential demonstration project. If the Commission decides not to approve the Click and Claim proposal, with or without modification, then it should provide adequate justification for its decision.

#### **IV. CONCLUSION**

The Clean Coalition appreciates the opportunity to submit reply comments on the PD and supports the Commission's continued efforts in the Distribution Resources Plans proceeding.

Respectfully submitted,



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